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December 4, 1997

DOCKET FILE COPY ORIGINAL

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RECEIVED

DEC 4 - 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Via Hand Delivery

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: Perry, Florida
MM Docket No. 97-205

Dear Ms. Salas:

Women in FLA Broadcasting, Inc., by its attorneys, hereby files an original and five copies of its Supplement to Reply Comments in the above-referenced proceeding.

Please contact the undersigned directly if there are any questions concerning this matter.

Respectfully submitted,



David G. O'Neil

DGO:do
Enclosures (6)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DEC 4 - 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket No. 97-205
Table of Allotments) RM-9161
FM Broadcast Stations)
Perry, Florida)

To: Chief, Allocations Branch
Mass Media Bureau

**SUPPLEMENT TO REPLY COMMENTS OF
WOMEN IN FLA BROADCASTING, INC.**

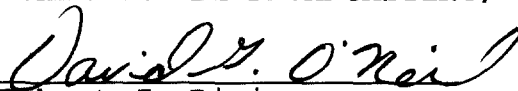
Women in FLA Broadcasting, Inc. ("Women"), by its attorneys, hereby files its Supplement to Women's Reply Comments filed with the Commission on December 2, 1997. The Supplement is filed for the limited purpose of substituting the original engineering statement for the facsimile submitted with the Reply Comments. The original is identical to the facsimile. Acceptance of this Supplement will not prejudice any part to this proceeding.

WHEREFORE, for the foregoing reasons, Women in FLA Broadcasting, Inc. respectfully request that the Commission accept these Supplement Comments.

Respectfully submitted,

WOMEN IN FLA BROADCASTING, INC.

By:


Robert J. Rini
David G. O'Neil

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December 4, 1997

Its Attorneys

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

WOMEN IN FLORIDA BROADCASTING
REQUEST TO DISMISS
COUNTERPROPOSAL TO MM DOCKET #97-205
BY DICKERSON BROADCASTING, INC.
December 1997

TECHNICAL EXHIBIT

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WOMEN IN FLORIDA BROADCASTING
REQUEST TO DISMISS
COUNTERPROPOSAL TO MM DOCKET #97-205
BY DICKERSON BROADCASTING, INC.
December 1997

This Technical Exhibit supports the request by Women in Florida Broadcasting ("Women") to dismiss the counterproposal submitted by Dickerson Broadcasting, Inc. ("Dickerson") to MM Docket 97-205, Perry, Florida. Dickerson counterproposed the allocation of Channel 228A at Perry, Florida, downgrading the Channel 295C1 allocation at Cross City to Channel 227C3 while simultaneously allotting Channel 249A to Perry among other changes to §73.202.¹

Exhibit #1 is a computerized printout of the Channel 227C3, Cross City, proposal demonstrating that this allocation is shortspaced to the one-step application submitted by De Col, Inc., licensee of WGWD, Channel 227C3, Gretna, Florida.² By this reference the counterproposal forwarded by Dickerson is contrary to the spacing requirements of §73.207 of the Commission's rules.

We have tried to be as accurate as possible in the preparation of this report. Should there be any questions concerning the information contained herein, we welcome the opportunity to discuss the matter by phone at 912-638-8028.

1) Channel 227C3, Cross City, Florida, at North Latitude 29° 49' 21", West Longitude 83° 11' 12" - site restricted 22 km north of Cross City. Channel 249A at Perry, Florida, at North Latitude 30° 01' 55", West Longitude 83° 28' 45" - site restricted 13.7 km southeast of Perry.

2) Also to the allocation site specified for Channel 227C3 in Gretna.

Graham Brock Inc. - Broadcast Technical Consultants
St. Simons Island GA - Washington DC

DICKERSON COUNTERPROPOSAL
DOWNGRADED CROSS CITY ALLOCATION

REFERENCE	CLASS C3	DISPLAY DATES
29 49 21 N		DATA 11-28-97
83 11 12 W	Current rules spacings	SEARCH 12-02-97
----- CHANNEL 227 - 93.3 MHZ -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD228	228A	Perry	FL	311.3	49.60	89.0	-39.40 *
AD	30 07 00	83 34 26	0.000 kW	0M	30.8	55.3	
		Frank Vela			RM9161		970819
>Site Restriction 0.8 km East							
WGWD.A	227C3	Gretna	FL	301.8	143.57	153.0	-9.43 *
AP ZCN	30 29 48	84 27 33	8.700 kW	152M	89.2	95.1	
		De Col, Inc.			BPH971112IG		
>Change from Channel 227A per one-step application							
ALOPEN	227C3	Gretna	FL	305.7	147.10	153.0	-5.90 *
AL N	30 35 21	84 26 01	0.000 kW	0M	91.4	95.1	
>To Channel 227C3 per one-step application							
WPLA	227C2	Callahan	FL	62.1	177.05	177.0	0.05 <
LI CN	30 33 22	81 33 13	50.000 kW	141M	110.0	110.0	
		PAXSON JACKSONVILLE LICENSE L			BLH950822KA		
WFLZ	227C	Tampa	FL	157.5	237.27	237.0	0.27 <
LI CY	27 50 32	82 15 46	100.000 kW	414M	147.5	147.3	
		Jacor Broadcasting of Tampa B			BLH880627KA		
WGWD	227A	Gretna	FL	301.3	158.70	142.0	16.70
LI ZCN	30 33 24	84 36 05	6.000 kW	100M	98.6	88.3	
		De Col, Inc.			BLH930805KA		
>Change to Channel 227C3 per one-step application BPH-971112IG.							
WOGK	229C	Ocala	FL	119.7	123.54	96.0	27.54
LI CN	29 16 06	82 04 51	100.000 kW	411M	76.8	59.7	
		Ocala Broadcasting Corporatio			BLH870915KA		
WAAC	225C1	Valdosta	GA	351.6	109.97	76.0	33.97
LI CN	30 48 13	83 21 20	100.000 kW	153M	68.3	47.2	
		Wgov, Inc.			BLH860903KD		

EXHIBIT #1
WOMEN IN FL BROADCASTING
REQUEST TO DISMISS
COUNTERPROPOSAL TO
MM DOCKET #97-205 BY
DICKERSON BROADCASTING, INC
December 1997

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

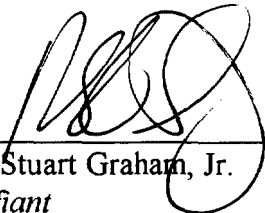
State of Georgia)
St. Simons Island) ss:
County of Glynn)

R. STUART GRAHAM, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Women in Florida Broadcasting to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in Broadcast Engineering since 1972.

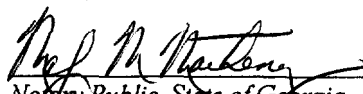
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 2nd day of December, 1997.



R. Stuart Graham, Jr.
Affiant

*Sworn to and subscribed before me
this the 2nd day of December, 1997*



Notary Public, State of Georgia
My Commission Expires September 12, 1999

CERTIFICATE OF SERVICE

I, Yvette King, a secretary with the law firm of Rini, Coran & Lancellotta, do hereby certify that I have caused a copy of the foregoing "Supplement to Reply Comments of Women in FLA Broadcasting, Inc." to be mailed, first-class, postage prepaid this 4th day of December 1997 to the following persons:

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Yvette King

* Via Hand Delivery